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*Ultimate Fighting Championship and UFC*  
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25  
26 Defendant.  
27  
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.  
GRIGSBY IN SUPPORT OF JOINT  
MOTION TO EXTEND DEADLINE  
FOR ZUFFA TO FILE MOTION TO  
SEAL PLAINTIFFS' OPPOSITION  
TO ZUFFA'S MOTION FOR  
SUMMARY JUDGMENT (ECF NO.  
599)**

**(First Request)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of  
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in  
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above  
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.  
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of the Joint Motion to Extend Deadline to File  
8 Motion to Seal. Based on my personal experience, knowledge, and review of the files, records, and  
9 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,  
10 if called to testify, could and would testify competently to those facts under oath.

11 3. Zuffa intends to move to seal certain documents, deposition testimony, and  
12 corresponding portions of Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment  
13 (“Plaintiffs’ Opposition”) that Zuffa believes contain confidential and commercially sensitive  
14 information that is properly sealed under the Ninth Circuit’s “compelling reasons” standard.

15 4. Plaintiffs’ Opposition is 45 pages in length and, in total, there are 141 exhibits  
16 attached to Plaintiffs’ Opposition.

17 5. Zuffa is in the process of reviewing Plaintiffs’ Opposition and all of the attached  
18 exhibits, which include a variety of documents ranging from depositions to expert reports to emails  
19 and other documents, in order to determine what documents and portions thereof the compelling  
20 reason standard for motions to seal.

21 6. In several recent filings, Plaintiffs and Zuffa have disagreed in motion practice as to  
22 what material is properly filed under seal under the compelling reasons standard as well as the good  
23 cause standard.

24 7. In a September 24, 2018 discussion with Kevin Rayhill, counsel for Plaintiffs,  
25 counsel for Zuffa discussed Zuffa’s desire to work to narrow and reduce any sealing disputes related  
26 to Plaintiffs’ Opposition. Mr. Rayhill agreed that it was in the interests of both parties to work to  
27 narrow and reduce sealing disputes.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
2 facts are true and correct. Executed this 25th day of September, 2018 in Washington, DC.

3  
4 /s/ Stacey K. Grigsby

Stacey K. Grigsby